

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION**

THE STATE OF LOUISIANA,  
By and through its Attorney General,  
Elizabeth B. Murrill, et al.

*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF  
COMMERCE, et al.,

*Defendants.*

No. 6:25-cv-00076-DCJ-DJA

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND  
TO INDIVIDUAL VOTERS' MOTION TO INTERVENE**

Pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and Local Civil Rule 7.9, Defendants respectfully move this Court for an extension of time until March 3, 2025 to respond to the individual voters' (Proposed Intervenor) Motion to Intervene, ECF No. 3. In support of this motion, Defendants state as follows:

1. Proposed Intervenor filed their Motion on January 27, 2025, ten days after the Complaint was filed in this matter. *See* ECF No. 1.
2. Counsel for Defendants did not enter an appearance until February 13, 2025, and had only been assigned to this matter a few days prior to his appearance. *See* ECF No. 29.
3. Former Director of the U.S. Census Bureau Rob Santos was a Defendant in this matter until his resignation on February 14, 2025, and he has not yet been replaced in his role. Defendants expect that new leadership will arrive at the U.S. Department of Commerce and the Census Bureau imminently.

4. Due to the press of business, the recent assignment of counsel for Defendants to this matter, and the expected arrival of new leadership at defendant agencies, Defendants request a reasonable extension of two weeks (March 3, 2025) to respond to Proposed Intervenor's Motion.

5. The requested extension will not delay the proceedings or otherwise prejudice any party.

6. On February 17, 2025, Defendants sought the view of Plaintiffs on this motion, and they do not oppose the extension. Defendants also sought the view of Proposed Intervenor on this motion, and they likewise do not oppose the extension, provided that their deadline to file a reply—as to both Defendants' and Plaintiffs' response to their Motion—is similarly extended so that they are thereby able to file a single reply. Otherwise, Proposed Intervenor would oppose this Motion for Extension.

For the foregoing reasons, good cause exists for the Court to grant this motion, and Defendants respectfully request that the Court grant the requested extension of time until March 3, 2025 for Defendants to respond to Proposed Intervenor's Motion. Defendants also request that Proposed Intervenor's deadline to reply to Plaintiffs, *see* ECF No. 36, likewise be extended. A proposed order is attached.

Dated: February 18, 2025

Respectfully submitted,

BRETT A. SHUMATE  
Acting Assistant Attorney General  
Civil Division

ALEXANDER K. HAAS  
Director

STEPHEN M. ELLIOTT  
Assistant Director

/s/ Kevin K. Bell  
KEVIN K. BELL

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*Counsel for the United States*

### **CERTIFICATE OF CONFERENCE**

On February 17, 2025, I met and conferred electronically with Plaintiffs and Proposed Intervenor with respect to this Motion for Extension, pursuant to Local Civil Rule 7.4.1. Plaintiffs indicated that they do not oppose the Motion for Extension, and Proposed Intervenor indicated that they also do not oppose Defendants' Motion for Extension, provided that Proposed Intervenor's deadline to file a reply—as to both Defendants' and Plaintiffs' response to their Motion to Intervene—is similarly extended so that they are thereby able to file a single reply. Otherwise, Proposed Intervenor would oppose this Motion for Extension.

/s/ Kevin K. Bell  
KEVIN BELL  
(GA Bar No. 967210)  
Trial Attorney

**CERTIFICATE OF SERVICE**

On February 18, 2025, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court for the Western District of Louisiana, using the electronic case filing system of the Court. I hereby certify that I have served all parties electronically or by another manner authorized by Fed. R. Civ. P. 5(b)(2).

/s/ Kevin K. Bell  
KEVIN BELL  
(GA Bar No. 967210)  
Trial Attorney